

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff,**

VS.

NO. 7:20-CV-00124

**1.276 ACRE OF LAND, MORE OR LESS,
SITUATE IN HIDALGO COUNTY,
STATE OF TEXAS, CELIA VIRGEN
AVENDANO, DE COLLADO, *et al.*,**

Defendants,

§ § § § § § §

ORIGINAL ANSWER OF HIDALGO COUNTY, TEXAS, et al.

TO THE HONORABLE JUDGE OF SAID COURT:

Now COMES, Hidalgo County, Texas, Hidalgo County Drainage District #4, Hidalgo County Emergency Services District #4, South Texas Independent School District, South Texas College, and Hidalgo Independent School District (“Taxing Authorities”), and files its Original Answer to United States of America’s Complaint in Condemnation (“Complaint”) and would respectfully show the Court the following:

1. Taxing Authorities admit the allegations in paragraph 1 of the Complaint.
 2. Taxing Authorities admit the allegations in paragraph 2 of the Complaint.
 3. Taxing Authorities admit the allegations in paragraph 3 of the Complaint.
 4. Taxing Authorities admit the allegations in paragraph 4 of the Complaint.
 5. Taxing Authorities admit the allegations in paragraph 5 of the Complaint.
 6. Taxing Authorities admit the allegations in paragraph 6 of the Complaint.

7. Taxing Authorities admit the allegations in paragraph 7 of the Complaint.
8. Taxing Authorities are unable to admit or deny the allegations in paragraph 8 of the Complaint therefore they are denied.
9. Taxing Authorities admit the allegations in paragraph 9 of the Complaint.

WHEREFORE, PREMISES CONSIDERED, Taxing Authorities pray that the Court

- a. recognize the continued existence of and validity of the tax liens securing payment of the taxes, penalties and interest assessed by Taxing Authorities on the subject property;
- b. order that taxes, penalties and interest owing to the Taxing Authorities be paid from the proceeds of the sale after the expenses of preservation of the sale and prior to distribution to any other claimant; and
- c. for all further relief to which Taxing Authorities may be entitled.

Respectfully Submitted,

ATTORNEY FOR TAXING AUTHORITIES

By: /s/ Douglas Steven Bird
DOUGLAS STEVEN BIRD
State Bar No. 02331330
Southern Admission No. 3438883
LORI GRUVER
State Bar No. 24007283
Southern Admission No. 22963
LINEBARGER GOGGAN
BLAIR & SAMPSON, LLP
P.O. Box 17428
Austin, Texas 78760
(512) 447-6675 (Telephone)
(512) 693-0728 (Facsimile)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been filed electronically and is to be served by electronic transmission to all parties on the court's electronic mailing matrix on June 17, 2020

/s/ Douglas Steven Bird
DOUGLAS STEVEN BIRD